

EXHIBIT 389

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4

5 -----) MDL No. 2804

6 IN RE: NATIONAL PRESCRIPTION)

7 OPIATE LITIGATION)

8 -----) Case No. 17-md-2804

9 THIS DOCUMENT RELATES TO:)

10 ALL CASES)

11 -----) Hon. Dan A. Polster

12

13 HIGHLY CONFIDENTIAL

14 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

15

16 VIDEOTAPED DEPOSITION OF

17 ELLEN WILSON

18

19 January 24, 2019

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21 Indianapolis, Indiana

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11 Q. Let me ask you a question because this is
12 actually important.

13 You said that you would go to Ms. Hinkle
14 if an order was too big, correct?

15 A. Yes.

16 Q. You would alert her?

17 A. Yes.

18 Q. So you would have to make that judgment,
19 correct?

20 A. Yes.

21 Q. How would you make that judgment?

22 MR. HYNES: Objection to form.

23 BY THE WITNESS:

24 A. When you're in there day in and day out

1 you just know when an order is too big.

2 BY MR. GOETZ:

3 Q. Mr. Milikan testified it was a gut
4 feeling?

5 A. Yes.

6 MR. HYNES: Objection.

7 BY MR. GOETZ:

8 Q. Would you agree it's a gut feeling?

9 A. Yes.

10 Q. Okay. And I appreciate that, but
11 unfortunately we are going to have to explain to
12 experts and a jury what that means.

13 So what does that mean, that gut feeling?

14 MR. HYNES: Objection to form.

15 BY THE WITNESS:

16 A. You just know after you're in there day in
17 and day out what's a big number. Like if they are
18 ordering, like, five, five, five and then all of a
19 sudden there is 150, that's a red flag.

20 BY MR. GOETZ:

21 Q. When you say "they are ordering" --

22 A. The --

23 Q. -- "five, five, five"?

24 A. On the pick document, if it says --

1 every -- every item in that cage they want five and
2 then all of a sudden it shoots up to, like, 150, that
3 would be a red flag.

4 Q. Okay. So if -- if they want five
5 Amoxicillin and then 150 hydro, that's a problem.

6 Is that what I'm hearing you say?

7 A. Amoxicillin is not in the cage.


8 Q. So what is in the cage? You talked about
9 testosterone.

10 A. Testosterone.

11 Q. If they want five units of -- of
12 testosterone and 150 of hydro, that to you is a sign
13 there is a problem?

14 A. Yes.

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19 A. Charlotte Rucker, when she trained me, she
20 said as -- we have three different size bottles of
21 hydrocodone in the cage. She said, As a rule you send
22 out 12 -- no more than 12 of the little ones, six of
23 the big ones and two to three of the bigger -- the
24 large size ones as a rule across the board.

1 BY MR. GOETZ:

2 Q. And that was in 1996?

3 A. Yes.

4 Q. And did you live by that rule for the --
5 for the remainder of your time there?

6 A. Yes.

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